

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
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Chapter 13 Standing Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:
GODFRED FREMPONG-MANSO

Case No.: 18-23586VFP

HEARING DATE: 09/06/2018

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The Debtor proposes to obtain a loan modification outside of the Court's Loss Mitigation process. As a result, the debtor must docket a redacted copy of the loan modification application prior to confirmation. In addition, adequate protection payments must be made to the lender during the loan modification process. This process should not exceed six months and if it does the debtor must then request loss mitigation or the Trustee will seek dismissal of the case.
- Debtor has failed to provide proof of income.

The debtor has failed to supply proof of Social Security Income. The debtor must provide the Trustee with a current Social Security statement or a recent bank statement showing the direct deposit of the same.
- Plan must be modified to delete "refinance" and add loan modification.
- The Trustee has reviewed last year's tax return and a substantial refund was received. The Trustee therefore requests that any refund above \$2,000.00 be turned over to the Trustee for the life of the plan.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: August 03, 2018

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee